

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORNRAT KEAWSRI, et. al. ,

Plaintiffs,

v.

RAMEN-YA INC., et. a.,

Defendants.

INDEX NO. 17-cv-2406 (LJL)(OTW)

NOTICE OF MOTION FOR AN ORDER OF
CONTEMPT TO BE IMPOSED AGAINST
KENJI KORA

Please take notice that, upon the declaration of Florence Rostami and all prior pleadings and proceedings herein, Plaintiffs/Judgment Creditors Ornat Keawsri, Sachina Nagae, Takayuki Sekiya, Siwapon Topon, Pimparat Ketchatrot, Thiratham Raksuk, Parichat Kongtuk, Tanon Leecheot, Thanatharn Kulaptip, Wanwisa Nakwirot, Natcha Natatpisit, and Parada Mongkolkajit through their undersigned counsel, hereby move the Court before the Honorable Lewis J. Liman, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on such day and time as counsel may be heard, for an order pursuant to the inherent power of the Court and 18 U.S.C. § 401: (1) adjudging that Defendant Judgment Debtor Kenji Kora (“Kora”) is in civil contempt of the court for his continued disobedience of and refusal to comply with this Court’s order and command, dated July 6, 2023 [DE 681] (“Order”), to turnover One Hundred and Forty Nine Thousand Dollars (\$149,000) to Judgment Creditors; (2) compelling Kora to *forthwith* turnover \$149,000 to Judgment Creditors in the form of a certified check made payable to Florence Rostami IOLA; and (3) providing such other and further relief as the Court deems is just and proper.

Please take further notice that, pursuant to Local Rule 6.1(b) of the United States District Courts for the Southern and Eastern Districts of New York, opposition affidavits and answering memoranda, if any, are to be served (filed on Court’s Electronic Case Filing) within fourteen (14)

days after the service of the moving papers.

Dated: New York, New York
October 2, 2023

Respectfully submitted.

FLORENCE ROSTAMI LAW, LLC

By: /s/ Florence Rostami

Florence Rostami

Neal Haber

frostami@rostamilaw.com

nhaber@rostamilaw.com

420 Lexington Avenue, Suite 1402

New York, New York 10170

Telephone (212) 209-3962

Fax (212) 209-7100

Attorneys for Plaintiffs